

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT - WESTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 1:23-mj-00230-RSK

ANDREW BLAIR HOWARD

Hon. Raymond S. Kent
U.S. Magistrate Judge

Defendant.

/

**DEFENDANT'S UNOPPOSED MOTION TO ENLARGE TIME
TO FILE STIPULATED EXHIBIT LIST AND TRIAL BRIEF**

Defendant Andrew Blair Howard, by undersigned counsel, moves the Court to enlarge the time within which to file the Defendant's Stipulated Exhibit List and Trial Brief and states the following:

1. At the Final Pretrial Conference held in this matter on January 24, 2024, the Court stated that it wanted materials such as the parties' Stipulated Exhibit Lists and Trial Briefs filed in this matter one week before the trial of this cause, currently scheduled for February 7, 2024.
2. The date by which the foregoing materials would be submitted is therefore, today, January 31, 2024.
3. During the time since the Final Pretrial Conference, undersigned counsel and counsel for the government, AUSA Lauren Biksacky, have been conferring and

cooperating in stipulating to exhibits that the government intends to offer at the trial of this matter, thus shortening the time that it will take to try this matter on February 7.

4. Based upon that cooperation and the parties' agreement, the government's Stipulated Exhibit List and stipulations regarding the elements of the offenses charged in this matter will be filed by the time set by the Court.

5. The Defendant and the government continue to confer and cooperate on the preparation of the Defendant's Stipulated Exhibit List thereby agreeing to the admissibility of exhibits at trial that will shorten the number of witnesses to be called in the matter.

6. The Defendant's Stipulated Exhibit List and the Defendant's Trial Brief are in the process of being prepared and will be filed, with the Court's permission, no later than the morning of Friday, February 2, 2024.

7. Undersigned counsel and AUSA Biksacky have conferred on the filing of this Motion and the Motion is unopposed by the government.

8. A proposed Order is included on the page following.

WHEREFORE, Defendant Andrew Howard respectfully moves the Court to enlarge the time to file the Defendant's Stipulated Exhibit List and Trial Brief to the morning of Friday, February 2, 2024.

Respectfully submitted,

Dated: January 31, 2024

(Order follows.)

/s/ Anthony J. Valentine

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ORDER

Upon the reading of the Defendant's above Motion, It is hereby,

Granted.

Denied.

Dated:

Raymond S. Kent
U.S. Magistrate Judge